EXHIBIT A

In The Matter Of:

Jonathan Santiago v.
Thomas Lafferty, et al.

Francis Matthews
March 31, 2016

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Original File Francis Matthews 3-31-16.txt to an officer in a drug unit in a neighboring jurisdiction that that might compromise the confidential informant?

A. Yes.

Q. Why?

A. Because it's a very closely guarded -- it's closely guarded information when you have an informant. You don't share that outside of a specific need or a case. If you have a light case or maybe the informant came to another police officer and said, I'm currently working for this other agency, and then you have a direct conversation regarding a criminal matter. You never just call over to another police department and say, this is my informant. Do you guys have anything on him?

Q. That's because you would be afraid that the department might disclose the informant's identity, correct?

A. Correct.

Q. Now, if a confidential informant says, I worked for the State Police, would it be acceptable for that officer and that agency to call the State Police and see what they